REILLY TAR & CHEMICAL CORPORATION

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November 24, 1982

1020A-82

Illinois EPA
Attention: Raymond A. Ehrhard
Division of Water Pollution Control
2200 Churchill Road
Springfield, Illinois 62706

Dear Mr. Ehrhard:

This is in response to your letter of October 28, 1982 requesting additional information on our waste water treatment permit and our application to develop a hazardous waste site.

I. Plans for cleanup of lagoon

A. Upon completion of the waste treatment system the lagoon will be cleaned and closed using the following steps in order of listing.

1. Pump all existing water from the lagoon to the waste treatment system. It is estimated this volume will be approximately 250,000 gallons.

2. Construct an earthen dike of clay to divide the lagoon into two equal volumes.

3. Pump treated water from the treatment system into one half of the sectioned lagoon while contaminated soil is removed from the other half.

a. Amount of soil removed will depend on degree of contamination which must be determined at time of cleaning. This can be accomplished by running test on a suitable compound such as described in attachment "A", which you received in our November 17, 1982 meeting. This method was successful at a cleanup of a lagoon at our Texas plant.

b. All removed soil will be disposed of in a RCRA approved landfill.

4. After the first half of the lagoon is cleaned, treated water from the treatment system will be channeled to the cleaned section and the water that has previously been placed in the contaminated section will be pumped to the treatment system for treatment prior to discharge to the cleaned section. If evaporation and seepage of treated water in the section of the lagoon being discharged to is not adequate to keep a section from overflowing, then treated water from the treatment plant will be discharged to the open field of the lagoon area.
5. The second section will then be cleaned using the same procedure as that used to clean the first section.
6. After both sections are cleaned, they will then both be used to receive the treated discharge from the treatment plant until it can be discharged to the public sanitary sewer system. (This is to be accomplished within six months of the start of operation of the treatment plant.)
7. All water will then be removed from the lagoon and retreated prior to discharge to the sanitary sewer.
8. Soil in the lagoon will then be retested for contamination and if necessary, additional contaminated soil will be removed to a RCRA approved landfill.
9. The lagoon will then be filled with clay soil and mounded to prevent ponding on the surface area above the lagoon area. Exact scheduling of this project is not possible due to variations in weather; however, complete closure of the lagoon is expected to be complete within one year after start of operation of the waste water treatment plant.

This is in reply to your questions from the Division of Land Pollution Control.

1. Waste Drums - As noted in Section V of the contingency plan, drums are located at seven (7) locations. These drums are two years old and meet DOT Specifications 17H.

   a. Shop

   b. Refinery pan room

   c. Enamel pan room

   d. Lab entrance

   e. Plant office

   f. Roofing pitch pavillion

   g. By #9 Storage

   All drums contain creosote oil contaminated material such as gloves, rags, etc. When filled they are emptied on the waste pile and reused.

2. The waste tanks referred to are the three waste water treatment tanks. They were included since they generate sludge (K035) which is stored in them as a matter of operation.

3. Waste pile - the location has been noted on Drawing #821300-3, which you received in our November 17, 1982 meeting. The waste contained in this area is U051. It is estimated that 250 cubic yards of this material is generated per year. The original plans were to incinerate it; however, our incinerator never became operable and the material is being disposed of at a secure RCRA landfill.

   The present pile is stored in a concrete pit which is being phased out and will be replaced with a steel above ground storage area located inside a building. Drawings of this area will be provided when they are complete. Any water collected in the present storage is pumped to the present lagoon. The storage pit is constructed of concrete walls and bottom 12 inches thick and extends above grade level two feet to prevent run-in or run-out of water. The pit is 10'3" deep, 61' long and 49' wide.

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4. Our original Part A application contained waste streams which were listed because they were used in the laboratory. Since that time federal RCRA personnel have advised we should delete these. We plan to delete them when we apply for our Part B application. The only waste streams which will be listed are K035 and U051.

5. Hydrogeological Data - as stated in previous meetings, the analysis had not been completed and would be forwarded to you when received. These were received on November 5, 1982 and you now have a copy of them.

Very truly yours,

REILLY TAR & CHEMICAL CORPORATION

W. A. Justin
Director Environmental Control

WAJ/bk

cc: Mr. L. L. Pirtle
Reilly Tar & Chemical Corporation
Granite City, Illinois